

FILED

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

JAN 04 2023

UNITED STATES OF AMERICA,

U.S. DISTRICT COURT-WND
CLARKSBURG, WV 26301

v.

Criminal No. 3:23-CR 3

SEAN JARRED DAVIS, aka Mike, aka White
Mike,
WARREN THOMAS GRAY, aka Stix,
MICHAEL EUGENE LUCAS, JR., aka Kevin,
DYLAN CARL KECKLER,
ERIK LEE KURZ, aka Edub,
NICHOLAS VASILIOS HAINIS,
JEANETTE L. HENKEL,
LISA GAIL CROUSE,
MELISSA SUE COLE,
DAMARKCO TYREE CANTY,
RACHAEL ELAINE BIGGS,
PAUL EDWARD POWNALL, II,
HEATHER MARIE ALEXANDER,
SHARON RENE WAGONER, aka Sherri,
ROBERT BRUCE STACHOW,
ANDREW LEE JONES, aka Jonezy,
GLENN ALLEN ROBEY,
KODY MICHAEL SHRIVER,
NOAH IZREEL NEVERDON, aka Melly,
DEXTER HORN,
MICHAEL WADE MCINTIRE, and
KAITLYN MARIE SHANKLIN,

Violations: 18 U.S.C. § 2
18 U.S.C. § 924(c)(1)(A)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 843(b)
21 U.S.C. § 843(d)
21 U.S.C. § 846

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute and to Distribute Forty Grams or More of Fentanyl)

From on or about February 1, 2021, to the return of this Indictment, in Hampshire County, in the Northern District of West Virginia, and elsewhere, defendants SEAN JARRED DAVIS, aka Mike, aka White Mike, WARREN THOMAS GRAY, aka Stix, and MICHAEL EUGENE LUCAS, JR., aka

Kevin, did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding together with each other and other persons to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and to distribute forty grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B).

COUNT TWO

(Conspiracy to Possess with Intent to Distribute and to Distribute Heroin and Fentanyl)

From on or about February 1, 2021, to the return of this Indictment, in Hampshire and Mineral Counties, in the Northern District of West Virginia, and elsewhere, defendants **SEAN JARRED DAVIS, aka Mike, aka White Mike, WARREN THOMAS GRAY, aka Stix, MICHAEL EUGENE LUCAS, JR., aka Kevin, DYLAN CARL KECKLER, ERIK LEE KURZ, aka Edub, NICHOLAS VASILIOS HAINIS, JEANETTE L. HENKEL, LISA GAIL CROUSE, MELISSA SUE COLE, DAMARKCO TYREE CANTY, RACHAEL ELAINE BIGGS, PAUL EDWARD POWNALL, II, HEATHER MARIE ALEXANDER, SHARON RENE WAGONER, aka Sherri, ROBERT BRUCE STACHOW, ANDREW LEE JONES, aka Jonezy, GLENN ALEN ROBEY, KODY MICHAEL SHRIVER, NOAH IZREEL NEVERDON, aka Melly, DEXTER HORN, MICHAEL WADE MCINTIRE, and KAITLYN MARIE SHANKLIN**, did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding together with each other and other persons to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT THREE

(Distribution of Fentanyl)

On or about June 23, 2021, in Hampshire County, in the Northern District of West Virginia, defendant **ANDREW LEE JONES, aka Jonezy**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

(Distribution of Fentanyl)

On or about September 29, 2021, in Hampshire County, in the Northern District of West Virginia, defendant **DYLAN CARL KECKLER**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Distribution of Fentanyl)

On or about October 5, 2021, in Hampshire County, in the Northern District of West Virginia, defendant **DYLAN CARL KECKLER**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Aiding and Abetting Possession With Intent to Distribute Fentanyl)

On or about October 13, 2021, in Hampshire County, in the Northern District of West Virginia, defendants **DYLAN CARL KECKLER, GLENN ALEN ROBEY, and KODY MICHAEL SHRIVER**, aiding and abetting each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

(Aiding and Abetting Possession With Intent to Distribute Methamphetamine Hydrochloride)

On or about October 13, 2021, in Hampshire County, in the Northern District of West Virginia, defendants **DYLAN CARL KECKLER, GLENN ALEN ROBEY, and KODY MICHAEL SHRIVER**, aiding and abetting each other, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute methamphetamine hydrochloride, also known as “ice,” a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Distribution of Fentanyl)

On or about February 7, 2022, in Hampshire County, in the Northern District of West Virginia, defendant **DYLAN CARL KECKLER**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

(Distribution of Fentanyl)

On or about February 8, 2022, in Hampshire County, in the Northern District of West Virginia, defendant **JEANETTE L. HENKEL**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

(Distribution of Fentanyl)

On or about February 14, 2022, in Hampshire County, in the Northern District of West Virginia, defendant **WARREN THOMAS GRAY, aka Stix**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

(Aiding and Abetting Distribution of Fentanyl)

On or about February 22, 2022, in Hampshire County, in the Northern District of West Virginia, defendants **WARREN THOMAS GRAY, aka Stix**, and **MICHAEL EUGENE LUCAS, JR., aka Kevin**, aiding and abetting each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

(Aiding and Abetting Unlawful Use of Communication Device)

On or about March 29, 2022, in Hampshire County, in the Northern District of West Virginia and elsewhere, defendants **SEAN JARRED DAVIS, aka Mike, aka White Mike**, and **JEANETTE L. HENKEL** did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count One of this Indictment, that is, the defendants used a telephone to arrange a distribution of a mixture and substance containing heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 843(b) and 843(d).

COUNT THIRTEEN

(Aiding and Abetting Unlawful Use of Communication Device)

On or about April 6, 2022, in Hampshire County, in the Northern District of West Virginia and elsewhere, defendants **RACHAEL ELAINE BIGGS** and **WARREN THOMAS GRAY, aka Stix**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count One of this Indictment, that is, the defendants used a telephone to arrange a distribution of a mixture and substance containing heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 843(b) and 843(d).

COUNT FOURTEEN

(Possess With Intent to Distribute Fentanyl)

On or about April 7, 2022, in Hampshire County, in the Northern District of West Virginia, defendants **PAUL EDWARD POWNALL, II**, and **HEATHER MARIE ALEXANDER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Aiding and Abetting Distribution of Fentanyl and Heroin)

On or about April 11, 2022, in Hampshire County, in the Northern District of West Virginia, defendants **WARREN THOMAS GRAY, aka Stix**, and **MICHAEL EUGENE LUCAS, JR., aka Kevin**, aiding and abetting each other, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and heroin; a Schedule I controlled substance, in exchange for United States currency; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Aiding and Abetting Unlawful Use of Communication Device)

On or about April 18, 2022, in Hampshire County, in the Northern District of West Virginia and elsewhere, defendants **SEAN JARRED DAVIS, aka Mike, aka White Mike**, and **JEANETTE L. HENKEL**, aiding and abetting each other, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count One of this Indictment, that is, the defendants used a telephone to arrange a distribution of a mixture and substance containing heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 843(b) and 843(d).

COUNT SEVENTEEN

(Possess With Intent to Distribute Fentanyl)

On or about April 20, 2022, in Hampshire County, in the Northern District of West Virginia, defendants **WARREN THOMAS GRAY, aka Stix**, and **MICHAEL EUGENE LUCAS, JR., aka Kevin**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

(Possession With Intent to Distribute Fentanyl)

On or about May 25, 2022, in Hampshire County, in the Northern District of West Virginia, defendant **ERIK LEE KURZ, aka Edub**, and **KAITLYN MARIE SHANKLIN**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINETEEN

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 25, 2022, in Hampshire County, in the Northern District of West Virginia, the defendant **ERIK LEE KURZ, aka Edub**, did knowingly possess a firearm, that is an Astra-Guernica, S.A. semi-automatic pistol, model A-100, 9mm parabellum caliber, bearing serial number 20064-95A, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is possession with intent to distribute fentanyl as charged in Count Eighteen; in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY

(Possess With Intent to Distribute Methamphetamine Hydrochloride)

On or about July 27, 2022, in Mineral County, in the Northern District of West Virginia, defendant **ROBERT BRUCE STACHOW**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute methamphetamine hydrochloride, also known as “ice,” a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Sections 841 and 846, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including the following items:

1. A New England firearm 410 seized on October 13, 2021;
2. \$197 in United States currency seized on October 13, 2021;
3. \$245 in United States currency seized on October 13, 2021;
4. \$200 in United States currency seized on October 13, 2021;
5. \$100 in United States currency seized on October 13, 2021
6. \$414 in United States currency seized on March 11, 2022;
7. A Taurus G3C 9mm pistol bearing serial number ACB499801 seized on April 11, 2022;
8. Two magazines seized on April 11, 2022;
9. Twenty-four rounds of ammunition seized on April 11, 2022;
10. One firearm box containing a Taurus G2C 9mm pistol bearing serial number ACL524559 seized on April 11, 2022;
11. One magazine seized on April 11, 2022;
12. Eleven rounds of ammunition seized on April 11, 2022;
13. A 9mm Astra A-100 pistol bearing serial number 20064-95A;
14. \$995 in United States currency seized on April 20, 2022; and
15. Various cellular devices.

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(g)(1), 924(c)(1)(A), and 924(a)(2), including assorted ammunition, firearm parts, and

1. A New England firearm 410 seized on October 13, 2021;
2. A Taurus G3C 9mm pistol bearing serial number ACB499801 seized on April 11, 2022;
3. Two magazines seized on April 11, 2022;
4. Twenty-four rounds of ammunition seized on April 11, 2022;
5. One firearm box containing a Taurus G2C 9mm pistol bearing serial number ACL524559 seized on April 11, 2022;
6. One magazine seized on April 11, 2022;
7. Eleven rounds of ammunition seized on April 11, 2022; and
8. A 9mm Astra A-100 pistol bearing serial number 20064-95A.

A true bill,

/s/
Grand Jury Foreperson

/s/
WILLIAM IHLENFELD
United States Attorney

Lara K. Ombs-Botteicher
Assistant United States Attorney